

**E N T R I X**  
**EXTERNAL MEMORANDUM**

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**To:** Nahid Zoueshtiagh, USEPA Region IX  
**From:** Kevin Wright  
**CC:** Tom Umenhofer  
**Date:** August 28, 2003  
**Subject:** FSRU Offshore Project

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Thank you for providing comments concerning your review of the information we provided you (Draft EA Project Description and Air Quality sections) for the subject project. Our responses to your comments are provided below.

***USEPA Comment 1: The OCD model is the appropriate air quality model for this application.***

***Response 1:*** We have initiated the assembly of 3 years of offshore NOAA buoy data (Buoy Station No. 46025, Santa Monica Basin) that coincides with the corresponding onshore 1991-1993 preprocessed meteorological data (Emma Wood/Ventura Station) provided to us by VCAPCD. We will be providing a modeling analysis in the PSD application utilizing the Offshore and Coastal Dispersion (OCD) Model using 1991-1993 combined onshore/offshore meteorological data as required by the model.

While the NOAA buoy data has not been quality assured by an air agency, it is recorded by a federal agency and is the most representative of the FSRU mooring location. We would appreciate your verification of the permitting acceptability of using the Buoy No. 46025 meteorological data set for the OCD modeling for this project.

***USEPA Comment 2: Will the applicant be submitting an air modeling protocol?***

***Response 2:*** We will be submitting an updated air quality modeling protocol. We would appreciate guidance on a specific format or requirement for this protocol.

***USEPA Comment 3: The information included in the draft documents provided did not include all the information required for a PSD application. Will that information be included in the PSD application, especially information on all engine emissions and a detailed description of the submerged combustion vaporizers (SCV)?***

**Response 3:** The requirements for the EA to be submitted to the lead agency (USCG) and the PSD permit application requirements are not identical as the PSD permit application is much more comprehensive.

We will be submitting a **complete** PSD application to your office containing the following components:

- A complete process description including the operation of the SCV units;
- An emissions summary including construction emissions, and uncontrolled and controlled project emissions. Those emission estimates include an emissions summary of each of the engine types that will be operating at the project. No engine emission sources have been excluded;
- Regulatory analysis including applicable federal and state rules and regulations;
- A complete BACT analysis and determination;
- Air Quality Impact Analysis; and
- Additional Impact Analyses, including visibility, growth, soil and vegetation, and impacts on threatened and endangered species.

Thank you for the suggestion to contact your Water Division on requirements other than air quality. We have contacted that staff and have prepared the appropriate NPDES permit applications.

Should you have any further comments on our PSD application submittal, please contact me.